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MEMORANDUM ENDORSED

March 1, 2020

Via ECF

Hon. Gregory H. Woods, United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: USA v. Adamson (Hasahn Murray
19-Cr-702 (GHW))

Dear Judge Woods:

I represent Hasahn Murray in the above matter. I am submitting this letter on behalf of both defendants with the consent of Ms. Lisa Scolari, counsel for Mr. Adamson. We are respectfully requesting an extension of time to file our pre-trial motions. Our reason for the request is as follows.

At this point, we are researching the question of how the statute of limitations in this case is affected by the fact that both defendants were under 17 years old at the time of the shooting at issue in this case. This is an issue of apparent first impression. Current case law holds that juveniles cannot be executed, nor can they be punished by life imprisonment. *Roper v. Simmons*, 543 US 551 (2005) (Juvenile cannot be sentenced to life without parole for non-homicide conviction); *Miller v. Alabama*, 567 US 460 (2012) (Juvenile cannot be sentenced to life without parole for homicide conviction). Given that a juvenile offender cannot legally be subject to the death penalty, we are in the midst of researching whether the 5-year statute of limitations is applicable in a case where the defendant cannot legally be subject to capital punishment.

Defense counsel is mindful of the scheduling order in this case. Our motion will not require a hearing, and will not interfere with the trial schedule.

The Government has no objection to our requested adjournment, provided their time to respond is likewise extended by two weeks.

Hon. Gregory Woods, United States District Judge

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Accordingly, we respectfully request that our time to file our motion be extended to March 20, 2020.

Very truly yours,

-S-

David K. Bertan

DKB

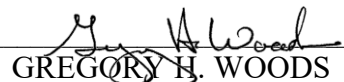
cc: AUSA Maurene Comey (via ECF)

Application granted. Defendants' March 1, 2020 request for an extension of time to file their pre-trial motions, Dkt. No. 16, is granted. Defendants' motions are due no later than March 20, 2020. The Government's opposition is due no later than April 3, 2020. Defendants' replies are due no later than April 10, 2020.

SO ORDERED.

Dated: March 2, 2020

New York, New York



GREGORY H. WOODS
United States District Judge